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December 22, 2021

**Via E-mail**

The Honorable Alvin K. Hellerstein  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

*Extensions are granted and  
sentencing is adjourned until  
March 25, 2022 at 11:30 am.*

Re: *United States v. Nicholas Truglia 19-cr-00921-AKH-1*

Dear Judge Hellerstein:

We represent Defendant Nicholas Truglia in the above-noted case. As the Court is aware, we have requested that our psychologist, Dr. Barry Katz, conduct a psychological evaluation of Mr. Truglia to identify potential information that could be useful to the Court at sentencing. This process is well underway, although it is still ongoing and is taking longer than originally anticipated. Additionally, the uptick in COVID-19 cases and the prevalence of the Omicron variant is expected to add logistical complications that will contribute to the delay.

We therefore write to respectfully request, first, that the Court adjourn the sentencing date, currently scheduled for January 18, 2022, to a date in April. The Government consents to this request, but for scheduling purposes requests that sentencing not take place between March 15 and April 10, 2022.

Second, we respectfully request that the deadline for the parties to respond to the first disclosure of the draft Presentence Investigation Report, currently this Monday, December 27, 2021, and the date for the second disclosure, currently January 11, 2022, each be adjourned for 60 days. The Government consents to this request as well; and the U.S. Probation Office has no objection.

Respectfully submitted,

*/s/ Jeffrey A. Udell*

Jeffrey A. Udell

cc: AUSA Timothy Capozzi  
U.S. Probation Officer Johnny Y. Kim